

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	24-CR-257
)	
vs.)	
)	
)	
TALYA LUBIT)	

MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS

Defendant, Talya Lubit, through her undersigned counsel, files this *Motion for Extension of Time to File Pre-Trial Motions* and in support thereof avers as follows:

1. Ms. Lubit is charged along with another person with two federal crimes: conspiracy, 18 United States Code Section 371; and defacing and damaging religious real property, 18 United States Code 247(c), 247(d)(5) and 2.
2. Ms. Lubit has been arraigned and discovery has apparently been provided to prior counsel.

3. Through a previous motion and corresponding order, a deadline for pre-trial motions was set for January 10, 2025. ECF #47.

4. This motion seeks a similar extension of time until April 10, 2025.

5. The driving force behind the request is that counsel just got involved in the case and is making efforts to secure the discovery material from prior counsel.

6. This suggested date of April 10th is consistent with this Court's recent order for Ms. Lubit's co-defendant, Mr. Hamad. See, ECF #60.

WHEREFORE, the defendant's counsel seeks an order from the Court granting this request and setting April 10, 2025, as the due date for any defense-generated pre-trial motions.

RESPECTFULLY SUBMITTED,

/s/David B. Chontos

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